

February 2, 2021

The Honorable Stephanie A. Gallagher
District Judge
United States District Court for the District of Maryland
101 West Lombard Street
Chambers 7C
Baltimore, Maryland 21201

Re: Joint Status Report, *Chae Bros., LLC v. Mayor and City Council of Baltimore*, Case No. 1:17-cv-01657

Judge Gallagher:

Pursuant to the Court's order, we are providing a joint status report in the above-referenced matter. The parties have largely completed fact discovery (expert discovery was bifurcated by agreement before Your Honor's assignment to the case). There are a few small outstanding matters that are expected to be resolved by the end of the month, notwithstanding the Court's order allowing Anthony Batts to be deposed outside of the discovery period.

Accordingly, we propose the following deadlines for dispositive fact motions in this case:

Motions for Summary Judgment	April 9, 2021
Responses to Dispositive Motions	June 9, 2021
Replies	July 9, 2021

Please let us know if you require additional information or clarification.

Respectfully,

/s/ Peter K. Hwang, Esq. Ray M. Shepherd, Esq. Counsel for Plaintiffs	/s/ Sara Gross, Chief Solicitor Hanna M. Sheehan, Assistant Solicitor Counsel for Defendant
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